

IN RE:  
SARAH ELIZABETH CHAVIS  
2312 NINETY SIX ROAD  
NORTH, SC 29112

DEBTOR

CHAPTER 13

CASE NO.: 21-00385-dd

**NOTICE OF MOTION, MOTION TO DISMISS CASE, NOTICE OF OPPORTUNITY FOR HEARING**

Pamela Simmons-Beasley, Chapter 13 Trustee, moves to dismiss this case based upon the grounds stated in this notice and motion.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to dismiss your case, or if you want the court to consider your views on the trustee's motion, then within 21 days of service of this notice, you or your attorney must:

File with the court a written response, return, or objection at:  
J. Bratton Davis U.S. Bankruptcy Courthouse  
1100 Laurel Street  
Columbia, South Carolina, 29201-2423

Responses, returns, or objections filed by an attorney must be electronically filed in ecf.scb.uscourts.gov.

If you mail your response, return, or objection to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must send a copy of your response, return, or objection to Pamela Simmons-Beasley, 250 Berryhill Road, Suite 402, Columbia, South Carolina, 29210.

Attend the hearing scheduled to be heard on August 08, 2022, at 10:00 a.m. at J. Bratton Davis U.S. Bankruptcy Courthouse, 1100 Laurel Street, Columbia, SC 29201.

**If no response, return, and/or objection is timely filed and served, no hearing will be held on this motion, except at the direction of the judge.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief prior to the scheduled hearing date, if determined to be appropriate.

The Chapter 13 Trustee, based upon 11 U.S.C. § 1307(c), moves to dismiss the above-referenced case because you failed to:

make the required payments pursuant to 11 U.S.C. § 1307(c). Should you fail to cure the delinquency within the time period to respond to this Motion set forth above, the trustee may request dismissal of this case without further notice or hearing. The trustee will request dismissal of your case at your next scheduled confirmation hearing if you have not cured the delinquency and the case has not otherwise been dismissed.

Date: July 06, 2022

/s/ Pamela Simmons-Beasley  
Pamela Simmons-Beasley, Trustee  
250 Berryhill Road, Suite 402  
Columbia, SC 29210  
Phone: (803) 779-5180 Fax: (803) 765-0167  
E-mail: pleadings@ch13trustee.net

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the Trustee's Petition to Dismiss was served on the debtor at the below address and the attorney for the debtor (if applicable) by US Mail first class postage prepaid or electronically through the Court's ECF System at the email address registered with the court.

Date: July 06, 2022

**Attorney for the Debtor (if applicable)**  
MOSS AND ASSOCIATES  
816 ELMWOOD AV  
COLUMBIA, SC 29201

**Debtor**  
SARAH ELIZABETH CHAVIS  
2312 NINETY SIX ROAD  
NORTH, SC 29112

/s/ Latoya Manigo  
Chapter 13 Trustee's Office